

**MICHAEL L. SOSHINICK**  
*Attorney at Law*  
190 WILLIS AVENUE  
SUITE 112  
MINEOLA, NEW YORK 11501

**MICHAEL L. SOSHINICK**  
**OF COUNSEL**  
**JOHN LAWRENCE**

**TEL (516) 294-1111**  
**FAX (516) 294-5465**

May 29, 2014

Honorable Marianne O. Battani  
United States District Court Judge  
Eastern District of Michigan  
Theodore Levin Building  
231 W. Lafayette Blvd.  
Detroit, MI 48226

Re: *U.S.A. v. Adam Savader*  
*District Court Docket No.: 1320522*

Dear Judge Battani:

As you may recall, my client, Adam Savader, appeared before the Court for sentencing on April 23, 2014. At that time, I asked the Court to recommend that the Defendant's thirty month custodial sentence be served at a facility in New York or the New York Metropolitan area, which consists of New York, New Jersey and Connecticut. This request was made because Adam is only 22 years old and suffers from mental health issues which would be alleviated by family contact and support.

Although you indicated that you could only make a recommendation and not guarantee where a defendant serves his custodial sentence, I believe that you acknowledged that my request was reasonable and that you would make an appropriate recommendation. However, in the paperwork that I received from the Court, your recommendation consisted of placement at a facility "near" New York. It has just recently come to my attention that the Bureau of Prisons has designated Elkton Federal Correction Facility in Ohio with a surrender date of June 10, 2014 at 12:00 pm. This facility is approximately 400 miles from Great Neck, New York, where my client's family resides.

Adam's mother, who addressed the Court at sentence, has been deemed permanently disabled by New York State. Adam's father has a chronic heart condition and has already suffered one heart attack. Additionally, Adam's father has diabetes and suffers from severe neuropathy in his feet, making driving long distances extremely difficult. Adam's sister suffers from cyclic vomiting syndrome (CVS), a stomach

disorder that precludes her from long car rides. Moreover, Adam's grandfather has been deemed permanently disabled by New York State. He has paralysis in one leg and a back condition that precludes long car rides. Finally, Adam's grandmother has issues of her own making lengthy travel impossible.

My office has called and emailed Assistant United States Attorneys Mollie O'Rourke and Matthew Roth in regard to this matter. However, as of this writing, neither prosecutor has emailed or called back. I am writing to ask the Court to contact the Designations Unit of the Bureau of Prisons in Grand Prairie, Texas at telephone number (972) 352-4400 in order to have Adam's designation changed to a facility with a mental health program in or closer to New York than Elkton, Ohio.

I truly believe that facilitating contact with and support from Adam's family during his period of incarceration would be helpful to Adam in his recovery. Furthermore, Adam is a beloved son, brother and grandson, and it would be a hardship on the entire family if the Elkton, Ohio designation is not changed. Accordingly, it would be greatly appreciated if you would clarify your recommendation in regard to Adam's upcoming custodial sentence and indicate that "near" New York should be limited to New York, New Jersey or Connecticut and not extend to Ohio.

Kindly advise as to whether this request is agreeable to the Court. Once again, thank you for your consideration.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Michael L. Soshnick", written over a light blue rectangular background.

Michael L. Soshnick

MLS kb

cc: Mr. and Mrs. Mitchell Savader